

**REMARKS****37 CFR 1.75**

Claims 76 and 77 are objected to under 37 CFR 1.75 as lacking antecedent basis for a claimed limitation. Claim 76 recites the limitation "said associated media content identifier" in line 4 of claim 76. Claim 77 recites the limitation "said media content identifier" in lines 1-2 of claim 77. Appropriate correction is made by the amendments to claims 76 and 77 made herein.

**Claim Rejections - 35 USC § 103(a)**

Regarding claim 75, the office action states Ottesen et al. discloses a transformer (See Fig. 3, 30) comprising:

a converter (See Fig. 3, 33) including an input for receiving format-unspecified media content

The office equates applicant's term: "format-unspecified media content" to mean: "multimedia programs wherein the received multimedia are not digitally compressed yet." In making this equation, the Office appears to equate "format" with "compression". Thus the office interpretation of the claim would recite: an input for receiving "compression unspecified" media content. Further, the office appears to equate "compression unspecified", with "uncompressed". Applicant respectfully points out the office's position is contradictory. An input is either compressed or uncompressed. In the office interpretation, "format" takes one of two possible conditions, compressed or uncompressed. In that case, "uncompressed" (not compressed yet) media at an input is **format –defined media content** . On the

other hand, according to the office, an undefined format would be an input where it is not defined at the input whether the signal is compressed or uncompressed. Ottesen makes no disclosure of such an input.

Assuming, arguendo, the two phrases could be equated, Ottesen still does not disclose a device including an input for receiving “compression unspecified” media content. At col. 7 Ottesen describes the storage format, not the format of the signal received at the input. Further, if the definition of “format” provided by the office is taken, Ottesen specifies a “format”, because Ottesen calls for a “compressed format”.

According to the office interpretation, Ottesen discloses, at most, that multimedia information is **stored in a “format specified” format**. The cited portions of Ottesen are provided below:

“Multimedia information is preferably stored in a compressed digital format on one or more digital storage devices 35. Suitable digital storage devices 35 include, for example, digital direct access storage devices (DASD) and digital audio tape (DAT) systems. In one embodiment, a plurality of digital DASDs may be configured as an array of DASDs operating...”

Therefore Ottesen cannot be said to disclose applicant’s claimed device which receives **“format-unspecified media content an input”**.

The office further cites col. 8 lines 18-28 as disclosing an input for receiving format-unspecified media content. Applicant can find no disclosure of an input of any kind in this cited portion of Ottesen. The office further cites Ottesen Col 8 line 65 as disclosing an input for receiving format unspecified media content. However, applicant notes these portions of Ottesen’s specification describe specific operations carried out programs already on in stored digital library, i.e., operations of converting the programs from one specified format to another specified format, i.e., analog to digital, or uncompressed to compressed. Nowhere is there a disclosure of any component of Ottesen’s device which is capable of receiving (at a device input) a “format-unspecified” signal of any kind.

Media Content vs. Storage Address for Media Content

The office action asserts Ottesen discloses applicant's claimed feature: "said converter automatically and separately providing:

- a)" at least one media block (e.g. 1 sec. video segment) comprising at least a portion of said media content (See Figs. 5 and 6; col. 9 lines 25-45)," and
- b)" a description of said portion of media content (e.g. A1, A2,...,AN) wherein said description does not include a storage address for said media block.

The office action cites Ottesen (See Figs. 5 and 7; col. 9 line 60 - col. 10 line 10) as disclosing this feature. The office action takes the contradictory position that a "video segment address A1 is "not a physical storage address". The office action states the characters "A1" are "used to identify the video segment within the multimedia program." The office action cites an example wherein "the 1 sec. video segment for A1 is stored at physical location R1,C1). Ottesen specifically states that "A1" is an address. See, e.g. Ottesen Col. 9 line " **A first video segment,...may be encoded, or tagged with an address identifier of "A1".**

Further, this position of the office is contradictory to previous positions taken by the Office. For example, in a previous office action the office **explicitly acknowledges that Ottesen fails to disclose a description of media content.**

Neither Ottesen nor Hjelsvold discloses, or suggests applicant's claimed feature:

"said converter automatically and separately providing:

- c)" at least one media block (e.g. 1 sec. video segment) comprising at least a portion of said media content (See Figs. 5 and 6; col. 9 lines 25-45)," and
- d)" a description of said portion of media content (e.g. A1, A2,...,AN) wherein said description does not include a storage address for said media block.

Therefore, applicant's claims 75-78 are not obvious in view of any combination of claimed references.

Having fully addressed the Examiner's rejections and in view of the preceding amendments and remarks, applicant believes this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. The examiner is invited to call applicant's attorney at 215-584-1159 to resolve any outstanding issues to advance the prosecution of this case.

Respectfully submitted,

Date: 4/23/2010

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